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Proposed Attorneys for Debtor and Debtor-In-Possession

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:

Case No. BK-S-06-10725 LBR

USA COMMERCIAL MORTGAGE
 COMPANY,

Chapter 11

Debtor.

**MOTION FOR ORDER SHORTENING TIME
 TO HEAR MOTION AUTHORIZING
 DEBTOR, PURSUANT TO 11 U.S.C. § 105
 AND § 363(b)(1), TO ACCEPT LOAN
 PAYMENT PROCEEDS AND PROVIDE
 PARTIAL RELEASES OR FULL RELEASES
 IN CONNECTION WITH THE SALE OF
 PROPERTIES SECURING LOANS
 ORIGINATED BY THE DEBTOR TO THIRD-
 PARTY BORROWERS, AND TO RATIFY
 PARTIAL RELEASES PREVIOUSLY
 PROVIDED BY THE DEBTOR**

Date of Hearing: OST REQUESTED

Time of Hearing: OST REQUESTED

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SCHWARTZER & MCPHERSON LAW FIRM
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1 Jeanette E. McPherson, Esq. of Schwartzer & McPherson Law Firm, attorney for the above
 2 captioned debtor and debtor in possession (the "Debtor"), hereby files this Motion For An Order
 3 Shortening Time To Hear Motion Authorizing Debtor, Pursuant To 11 U.S.C. § 105 and §
 4 363(b)(1), To Accept Loan Payment Proceeds And Provide Partial Releases Or Full Releases In
 5 Connection With The Sale Of Properties Securing Loans Originated By The Debtor To Third-
 6 Party Borrowers, And To Ratify Partial Releases Previously Provided By The Debtor (the
 7 "Motion") and in support thereof states as follows:

8 1. A Motion Authorizing Debtor, Pursuant To 11 U.S.C. § 105 and § 363(b)(1), To
 9 Accept Loan Payment Proceeds And Provide Partial Releases Or Full Releases In Connection
 10 With The Sale Of Properties Securing Loans Originated By The Debtor To Third-Party
 11 Borrowers, And To Ratify Partial Releases Previously Provided By The Debtor has been filed.
 12 This Motion requests that the Court enter an order granting the Motion to satisfy Debtor's critical
 13 and immediate need to assure its borrowers and other interested parties for real estate transactions
 14 on the secured loans originated by the Debtor, that the Debtor is able to satisfy its contractual
 15 obligations in connection with real estate closings, to accept loan payment proceeds, and provide
 16 the partial releases or full releases required in connection with the sale to bona fide purchasers of
 17 properties securing such loans. The Debtor believes that most, if not all, of the actions that Debtor
 18 is required to take in connection with these real estate closings are ordinary course of business
 19 transactions, but the parties to these closings, including borrowers, purchasers, title companies and
 20 senior lenders, have been questioning whether the Debtor has the ability and authority to
 21 participate in these closings. Therefore, Debtor has filed this Motion to seek assurance for
 22 interested parties that the actions taken and to be taken in the future by the Debtor in connection
 23 with these closings are authorized by the Bankruptcy Code and the Court. The Debtor further
 24 requests ratification by the Court of any partial releases already provided by the Debtor
 25 postpetition for any of the loans outlined in this Motion.

26 2. The Debtor is requesting that this Motion be heard as soon as possible at the
 27 hearing scheduled for May 18, 2006, to allow the Debtor to participate in the pending and future
 28 closings in the ordinary course of business.

3. Notice can be shortened pursuant to Bankruptcy Rule 9006(c)(1) and LR 9006(a).

4. Hearings are currently scheduled in this matter on May 18, 2006 at 9:30 a.m. to

hear other motions, and holding a hearing on the Motion at the same time would serve the interests of judicial economy.

5. No known party opposes hearing the Motion on shortened time.

Respectfully submitted on May 3, 2006.

/s/ Jeanette E. McPherson

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